

July 28, 2003

Ms. Marlene Dortch Commission's Secretary Office of the Secretary Federal Communications Commission 445 12th Street, S.W. Washington, D.C. 20554

Dear Ms. Dortch:

The following comments from Alaska Wireless Communications, LLC address the required categories of information required of all Tier III carriers for the Interim Report due August 1, 2003.

• The number of Phase I and Phase II requests received from PSAP's

We have received approximately 12 Phase I requests from our local PSAP since our launch date of February 1, 2003. The local PSTN is experiencing difficulties sending our call ID numbers to the local PSAP. We expect that this problem will be resolved within the next several weeks. It is unlikely that our PSAP will ever upgrade to support E911 Phase II.

• The carrier's specific technology choice (i.e. network-based or handset-based solution, as well as the type of technology to be used);

Alaska Wireless is pursuing a network-based solution using either the Grayson Wireless Geometrix solution which uses a combination of TDOA plus AOA or TruePosition's network based U-TDOA technology.

• Status on ordering and/or installing necessary network equipment;

The major problem that Alaska Wireless is having along with its GSM equipment vendor, is getting a response from either Grayson Wireless or TruePosition. Both of these companies resources are currently tied up supporting AT&T Wireless and Cingular Wireless in meeting their E911 obligations. They do not have the band width to deal with Tier III carriers.

• If the carrier is pursuing a handset-based solution, the Report must also include information on whether Automatic Location Identification capable ("ALI-capable") handsets are now available, and whether the carrier has

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obtained ALI-capable handsets or has agreements in place to obtain these handsets;

Alaska Wireless is pursuing a network-based solution, therefore this category is not applicable.

• The estimated date on which Phase II service will first be available in the carrier's network;

This will be dependent on the support we receive from Grayson Wireless and TruePosition.

• Information whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005;

Alaska Wireless will meet the December 31, 2005 deadline for the deployment of E911 Phase II services.

Sincerely,

Paul Ostrander V.P. of Operations